

Docket Nos.: 52-025  
52-026

ND-19-1460  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.1.02.09a [Index Number 41]

Ladies and Gentlemen:

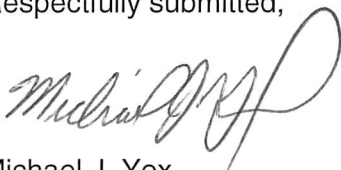
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of December 2, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.02.09a [Index Number 41] has not been completed greater than 225-days prior to initial fuel load. The enclosure describes the plan for completing this ITAAC. Southern Nuclear Operating Company will, at a later date, provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by the guidance described in NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52*, which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,



Michael J. Yox  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.1.02.09a [Index Number 41]

MJY/DLW/sfr

**To:**

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. Peter P. Sena III (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. G. Chick

Mr. M. Page

Mr. P. Martino

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. T. G. Petrak

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. L. Hughes

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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**cc:**

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)

Mr. F. D. Brown

Mr. C. P. Patel

Mr. G. J. Khouri

Ms. S. E. Temple

Mr. N. D. Karlovich

Mr. A. Lerch

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coover

Mr. C. Welch

Mr. J. Gaslevic

Mr. V. Hall

Mr. G. Armstrong

Ms. T. Lamb

Mr. M. Webb

Mr. T. Fredette

Mr. C. Weber

Mr. S. Smith

Mr. C. Santos

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman

Mr. E. Rasmussen

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)  
Mr. D. C. Durham (w/o enclosures)  
Mr. M. M. Corletti  
Ms. L. G. Iller  
Mr. Z. S. Harper  
Mr. J. L. Coward

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*  
Ms. L. Matis, *Tetra Tech NUS, Inc.*  
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*  
Mr. S. Roetger, *Georgia Public Service Commission*  
Ms. S. W. Kernizan, *Georgia Public Service Commission*  
Mr. K. C. Greene, *Troutman Sanders*  
Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company  
ND-19-1460  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.1.02.09a [Index Number 41]**

## **ITAAC Statement**

### **Design Commitment**

9.a) The RCS provides circulation of coolant to remove heat from the core.

### **Inspections/Tests/Analyses**

Testing and analysis to measure RCS flow with four reactor coolant pumps operating at no-load RCS pressure and temperature conditions will be performed. Analyses will be performed to convert the measured pre-fuel load flow to post-fuel load flow with 10-percent steam generator tube plugging.

### **Acceptance Criteria**

The calculated post-fuel load RCS flow rate is  $\geq 301,670$  gpm.

## **ITAAC Completion Description**

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-RCS-ITPP-506 and 4-RCS-ITPP-506 (References 1 and 2) to confirm that at no-load Reactor Coolant System (RCS) pressure and temperature conditions, the calculated post-fuel load RCS flow rate is  $\geq 301,670$  gpm with 10-percent steam generator tube plugging.

The testing measures RCS parameters using installed and temporary instrumentation and is trended and recorded using plant computer trends and a high-speed data acquisition system. When the RCS is at approximately 557°F and 2240 psig with all 4 Reactor Coolant Pumps (RCPs) at 100% speed for a minimum of 12 hours to ensure thermal stability, the trend data is taken for approximately 10 minutes. This data is analyzed to determine the post-fuel load flow rate with 10-percent steam generator tube plugging. This analysis is documented and attached to References 1 and 2.

The results of the testing and analysis demonstrate that Unit 3 RCS flow rate is XXX,XXX gpm and Unit 4 RCS flow rate is YYY,YYY gpm which confirms the calculated post-fuel load RCS flow rate is  $\geq 301,670$  gpm.

References 1 and 2 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.1.02.09a Completion Packages (Reference 3 and 4).

## **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. 3-RCS-ITPP-506, "Reactor Coolant Pump and Reactor Coolant Flow Precore Hot Functional"
2. 4-RCS-ITPP-506, "Reactor Coolant Pump and Reactor Coolant Flow Precore Hot Functional"
3. 2.1.02.09a-U3-CP-Rev0, ITAAC Completion Package
4. 2.1.02.09a-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"